UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 16 2012

REPLY TO THE ATTENTION OF: E-19J

Christina Miller
National Park Service
12795 West Alameda Parkway
P.O. Box 25287
Denver, Colorado 80225

Re: Draft General Management Plan (Management Plan)/Environmental Impact Statement (EIS) for the Ice Age Complex at Cross Plains, Wisconsin - EIS No. 20120048

Dear Ms. Miller:

In accordance with our responsibilities under the National Environmental Policy Act, the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air, we have reviewed the Draft Management Plan and EIS for the above-mentioned project.

The Ice Age Complex at Cross Plains comprises land within a unit of the Ice Age National Scientific Reserve; it also includes the interpretative site for the Ice Age National Scenic Trail. Lands within the Complex are owned and managed by the National Park Service, the Wisconsin Department of Natural Resources, Dane County Parks, and the U.S. Fish and Wildlife Service. The proposed Management Plan establishes the necessary framework to assist the partners in establishing a consistent vision for the Complex. The Management Plan/EIS identifies desired conditions in various parts of the Complex, identifies necessary developments and support facilities to achieve the desired conditions, and ensures that a foundation for decision making is developed in consultation with the public. The Management Plan/EIS does not, however, describe how particular programs or projects would be implemented.

The Management Plan/EIS examines five alternatives for managing the site for the next 15 – 20 years. The action alternatives describe how site management would change in different ways by applying management areas to maps of the Complex to define management intent for resource conditions as well as for visitor experience. Desired conditions and analyses of impacts of implementing each alternative are detailed for the five alternatives.

The five alternatives are summarized as follows:

Alternative 1 - No Action or Continuation of Current Management: This alternative looks into the future of current management and describes how the Complex would look in the future if no new actions were taken.

Alternative 2 – Ecological Restoration Emphasis: This alternative proposes to restore the ecosystem throughout most of the site to a period before European settlement. Restoration would support interpretation of how natural conditions in the Complex would have evolved after the glacial period under minimal human influence.

Alternative 3 – Interpretation and Education Emphasis: This alternative focuses on interpreting how the glacial landscape evolved over time since the retreat of the last glacier. Throughout most of the Complex, ecological resources would be managed to reveal the glacial landscape.

Alternative 4 – Outdoor Recreation Emphasis: This alternative offers visitors a variety of low-impact outdoor recreation experiences in support of and compatible with preservation and interpreting of the glacial significance of the Complex.

Alternative 5 – Preferred Alternative: This alternative offers ranger interpretive programming of the landscape since the retreat of the last glacier as well as a broad outdoor experience.

Based on our review of the Management Plan/EIS, we have assigned a rating of Environmental Concerns – Adequate (EC-1) to this document. Our rating is based on: 1) issues connected to water quality, 2) information concerning current management areas, and 3) discussions with relevant entities concerning future bike paths and traffic management.

Water Quality

The Management Plan/EIS indicates the region surrounding the Complex contains one of the Midwest's most important trout fishing streams, Black Earth Creek. Additionally, several lakes, intermittent streams, and springs exist within the Complex. As indicated in the document, an increase in impervious surfaces from development within the Complex as envisioned in the alternatives would result in more surface water runoff and impacts on stream and lake water quality. Given that the Park Service and its partners have indicated they will renovate the Wilkie parcel to U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) standards, we recommend the Park Service and its partners investigate the use of permeable pavers to reduce runoff and related soil erosion impacts and to better manage stormwater on site.

Management Areas

Most of Chapter Two, "Alternatives, Including the Preferred Alternative," is dedicated to describing the five management areas and the alternative futures for the Complex developed by the planning team. As the Management Plan/EIS indicates, the action alternatives indicate how site management would change in different ways by applying management areas (descriptions of distinct sets of resource conditions and visitor experiences) to maps of the complex to define management intent for resource conditions and visitor experiences for each location. We recommend a map(s) illustrating the current management area system under the No Action Alternative be included in the Management Plan/EIS. This addition would enhance the discussion featured in Table 2; Five Management Areas for the Ice Age Complex, and the "Proposed Management Areas" shown in the map of each Alternative contained in Chapter Two. The addition would also allow reviewers to understand what areas will change from current conditions under each alternative and by how much.

Bike Path Along U.S. Highway 14
The Management Plan/EIS indicates that there have been local efforts to build a bike path along the section of U.S. Highway 14 that forms the northern boundary of the Complex in order to connect bike paths in the City of Middleton to the Village of Cross Plains. The Preferred Alternative is zoned to accommodate this bike path. However, the Management Plan indicates that neither the National Park Service nor the Wisconsin Department of Natural Resources envisions constructing the bike path; rather the agencies would accommodate local efforts to build this path.

We recommend the Management Plan/EIS be revised to include a summary of any discussions with Wisconsin Department of Transportation (WisDOT) concerning this bike path. A summary of current discussions between local entities and WisDOT would inform reviewers of the likelihood that this bike path will materialize.

Aquatic Resources
Two wetland areas – one small wetland in the southeast corner of the Complex and two small floodplains in the southeast and northwest portions of the site - are mentioned in the Management Plan/EIS. Two elements of the proposed alternatives could affect wetlands and floodplains – building a picnic area near Black Earth Creek and building a trail in the same area. Even though impacts to these resources are speculative at this juncture, we recommend the Park Service and its partners follow the measures listed below to minimize impacts to wetlands during construction should these plans be implemented at some point in the future.

- Perform construction in wetlands during frozen ground conditions, if feasible;
- Minimize width of temporary access roads;
- Use easily-removed materials for construction of temporary access roads and staging areas (e.g., swamp/timber mats) in lieu of materials that sink (e.g., stone, rip-rap, wood chips);
- Use swamp/timber mats or other alternative matting to distribute the weight of the construction equipment. This will minimize soil rutting and compaction;
- Use vehicles and construction equipment with wider tires or rubberized tracks, or use low ground pressure equipment to further minimize impacts during construction access and staging;
- Use long-reach excavators, where appropriate, to avoid driving or staging in wetlands; and
- Place mats under construction equipment to contain any spills.

Diesel Emissions
The National Institute for Occupational Safety and Health (NIOSH) has determined that diesel exhaust is a potential occupational carcinogen, based on a combination of chemical, genotoxicity, and carcinogenicity data. In addition, acute exposures to diesel exhaust have been linked to health problems such as eye and nose irritation, headaches, nausea, asthma, and other respiratory system issues.

Although every construction site is unique, common actions can reduce exposure to diesel exhaust. EPA recommends that the Park Service and its partners commit to the following actions during construction:

- Using low-sulfur diesel fuel (less than 0.05% sulfur).
- Retrofitting engines with an exhaust filtration device to capture diesel particulate matter before it enters the construction site.
- Positioning the exhaust pipe so that diesel fumes are directed away from the operator and nearby workers, thereby reducing the fume concentration to which personnel are exposed.
- Using catalytic converters to reduce carbon monoxide, aldehydes, and hydrocarbons in diesel fumes. These devices must be used with low sulfur fuels.
- Using enclosed, climate-controlled cabs pressurized and equipped with high efficiency particulate air (HEPA) filters to reduce the operators' exposure to diesel fumes. Pressurization ensures that air moves from inside to outside. HEPA filters ensure that any incoming air is filtered first.
- Regularly maintaining diesel engines, which is essential to keeping exhaust emissions low. Follow the manufacturer's recommended maintenance schedule and procedures. Smoke color can signal the need for maintenance. For example, blue/black smoke indicates that an engine requires servicing or tuning.
- Reducing exposure through work practices and training, such as turning off engines when vehicles are stopped for more than a few minutes, training diesel-equipment operators to perform routine inspection, and maintaining filtration devices.
- Purchasing new vehicles that are equipped with the most advanced emission control systems available.
- With older vehicles, using electric starting aids such as block heaters to warm the engine reduces diesel emissions.

Miscellaneous

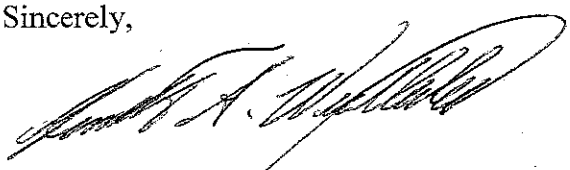
Figure 12: Detailed Map of Glacial and Related Deposits in the Ice Age Complex, includes areas labeled "L" and "H." However, these complexes are not included in the key and are not mentioned in the accompanying narrative. We feel the document would be enhanced by including a discussion of these deposit types.

We commend two aspects, in particular, of the Preferred Alternative. The first is the proposed renovation of the former Wilkie property into a highly-sustainable, gold-certified LEED standard facility. The Wilkie property is slated to accommodate offices for Ice Age National Scenic Trail staff and provide a visitor center. The second is the proposed creation of a wildlife corridor providing unbroken habitat between the former Wilkie property and Shoveler Sink Waterfowl Production Area, resulting in minor beneficial impacts to wildlife and habitat.

Please send one copy of the Final Management Plan/EIS and Record of Decision to my attention once it becomes available. Should you have any questions regarding the contents of this letter, please do not hesitate to contact me or Kathy Kowal at (312) 353-5206 or via email at

kowal.kathleen@epa.gov. A summary of the rating system used in the evaluation of this document is enclosed for your reference.

Sincerely,



Kenneth A. Westlake
Chief, NEPA Implementation Section
Office of Enforcement and Compliance Assurance

Enclosure